

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

UNITED STATES OF AMERICA,	:	
	:	CRIMINAL INDICTMENT
v.	:	
	:	NO. 1:11-CR-239-CAP-ECS
ADRIAN MARTINEZ-MONTANEZ (01),	:	
a/k/a Alex,	:	(SUPERSEDING)
ROBERTO PEREZ-MENDOZA (02),	:	
a/k/a Carlos,	:	
FRANKLIN ALVARADO-MEJIA (03),	:	
a/k/a Frankie,	:	
MARVIN EDLEMAN RODAS-PEREZ (04),	:	
a/k/a Marvin,	:	
LUIS ALBERTO HERNANDEZ-	:	
MEJIA (05),	:	
AMADO ERIVES-MONTES (06),	:	
JAVIER COLON-HERNANDEZ (07),	:	
a/k/a Cabo,	:	
CARLOS MORALES (08),	:	
WILSON TEJADA (09),	:	
FATIMA VASQUEZ (10),	:	
JESUS MANUEL SANDOVAL (11),	:	
MARIA MADRIZ-HERNANDEZ (12),	:	
a/k/a Sandra,	:	
SAMANTHA SEPULVEDA-MADRIZ (13),	:	
RAUL VALENCIA (14),	:	
JOSE VALENCIA (15),	:	
a/k/a Cobo,	:	
MARTIN AYALA-CASTENEDA (16),	:	
FAUSTO BUENO-ALVAREZ (17),	:	
a/k/a Gordo,	:	
FELIX JOSE VARGAS (18),	:	
CELEDONIO VICTOR ESTRADA (19),	:	
a/k/a Chaparro,	:	
JOSE VARGAS (20),	:	
a/k/a Mayate,	:	
PEDRO PABLO GOMEZ-RIVERO (21),	:	
a/k/a Trucha,	:	
MANUEL ZUNIGA (22),	:	
a/k/a Bebe,	:	
JOSE SANCHEZ-VALENCIA (23),	:	
GEOVANY MARTINEZ-VARGAS (24),	:	
SONIA SANCHEZ (25),	:	
CARMEN BARBOSA MENDOZA (26),	:	

a/k/a Maricarmen Mendoza-	:
Cardenes,	:
MARIA DEL ROSARIO	:
DIAZ-GARCIA (27),	:
a/k/a Chayo,	:
DESIREE FRAGOZA (28),	:
a/k/a Gorda,	:
TOMAR SHAW (29),	:
a/k/a Jay,	:
DAVID SANCHEZ (30),	:
VICTOR MANUEL	:
ANGUIANO-GUTIERREZ (31),	:
a/k/a Juan Castinanda,	:
a/k/a Brujo,	:
RUDY VALENCIA (32), and	:
ROBERTO LOPEZ-MARTINEZ (33),	:
a/k/a Nicolas Sanchez.	:
	:
Defendants.	:

# **BILL OF PARTICULARS**

NOW COMES the United States of America, by and through counsel, Sally Quillian Yates, United States Attorney, and Michael J. Brown, Assistant United States Attorney, and hereby files this Bill of Particulars specifying additional property subject to forfeiture under the forfeiture provision of the above-captioned indictment:

- a. **6339 VALLEY DALE DRIVE, RIVERDALE, CLAYTON, COUNTY, GEORGIA**, and all buildings and appurtenances thereon, more particularly described as follows:

**All that tract or parcel of land lying and being in Land Lot 139 of the 13<sup>th</sup> District of Clayton County, Georgia, being more particularly described at follows:**

**Beginning at an iron pin found on the southerly right of way Line of Way Line of Valley Dale Drive (50 foot right of way); six hundred ninety-six and**

one tenth (696.1) feet southeasterly and easterly, as measured along the southwesterly and southerly right of way line of Valley Dale Drive from the corner formed by the intersection of the southwesterly right of way line of Valley Dale Drive with the southeasterly right of way line of way line of Roy Huie Road (80 foot right of way); thence running easterly along the southerly right of way line of Valley Dale Drive, eighty-five (85) feet to an iron pin found; thence southerly along the westerly line of Lot 12, said block and subdivision herein after referred to, one hundred fifty (150) feet to an iron pin found; thence westerly eighty-five (85) feet to an iron pin found; thence northerly along the easterly line of Lot 10, said block and subdivision hereinafter referred to, one hundred fifty (150) feet to the iron pin found on the southerly right of way line of Valley Dale Drive at the point of beginning; being known as Lot 11, Block A, Unit One Adams Estates, as per plat recorded at Plat Book 16, Page 186, Clayton County records, and being improved property known as 6339 Valley Dale Drive, according to the present system of numbering house in the City of Riverdale, Clayton County, Georgia. Said description is in accordance with a survey prepared by Carter Land Surveying Co., dated 10/20/1982.  
[Parcel No. 13139B-C017]

- b. 1635 NORDEN ROAD, RIVERDALE, CLAYTON COUNTY, GEORGIA, and all buildings and appurtenances thereon, more particularly described as follows:

All that tract or parcel of land lying and being in Land Lot 154 of the 13<sup>th</sup> District of Clayton County, Georgia, being 4.266 acres, more or less, as follows:

BEGINNING at an iron pin found on the Northwestern Right of Way line of Norden Road (a/k/a King Road) 589.41 feet Southwesterly from the intersection of the Southerly R/W line of Collier Road and the Northwestern R/W line of Norden Road; thence along the Northwestern R/W line of Norden Road South 23

degrees 30 minutes 34 seconds West 244.71 feet to an iron pin; thence South 23 degrees 30 minutes 34 seconds West and continuing along the Northwesterly R/W line of Norden Road 8.41 feet to an iron pin; thence North 42 degrees 42 minutes 37 seconds West 890.04 feet to an iron pin set; thence North 00 degrees 25 minutes 46 seconds East 35.79 feet to an iron pin found; thence North 00 degrees 25 minutes 46 seconds East 238.27 feet to an iron pin found; thence South 45 degrees 16 minutes 26 seconds East 988.84 feet to an iron pin found on the Northwesterly R/W line of Norden Road and the POINT OF BEGINNING; being shown on that certain plat prepared by Perry E. McClung, RLS No. 1541, dated 8/1/89 and known as 1635 Norden Road according to the present system of numbering houses in Clayton County, Georgia.  
[Parcel No. 13154A-A011]

- c. 519 STEPHENS POINT DRIVE, LAWRENCEVILLE, GWINNETT COUNTY, GEORGIA, and all buildings and appurtenances thereon, more particularly described as follows:

All that tract or parcel of land lying and being in Land Lot 212, the 5<sup>th</sup> District, Gwinnett County, Georgia, being Lot 60, Block A, Stephens Point, Phase I, as per Plat recorded in Plat Book in Plat Book 51, Page 157, Gwinnett County, Georgia Records, which plat is incorporated herein by reference and made A part hereof.  
[Parcel No. 5212-055]

Respectfully submitted,

SALLY QUILLIAN YATES  
UNITED STATES ATTORNEY

/s/ Michael J. Brown  
MICHAEL J. BROWN  
ASSISTANT U.S. ATTORNEY  
GEORGIA BAR NO. 064437  
75 SPRING STREET, S.W., STE 600  
ATLANTA, GEORGIA 30303  
(404)581-6131 - PHONE  
(404)581-6234 - FAX

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

UNITED STATES OF AMERICA,	:	
	:	CRIMINAL INDICTMENT
v.	:	
	:	NO. 1:11-CR-239-CAP-ECS
ADRIAN MARTINEZ-MONTANEZ (01),	:	
a/k/a Alex, et al.,	:	(SUPERSEDING)

**CERTIFICATE OF SERVICE**

This is to certify that I have prepared the foregoing Bill of Particulars in compliance with Local Rule 5.1, NDGa., using Courier New 12 point type and have this day electronically filed the document with the Clerk of Court using the CM/ECF system.

This 29th day of July, 2011.

/s/ Michael J. Brown  
MICHAEL J. BROWN  
ASSISTANT U.S. ATTORNEY